

Serial No.: 09/586,410

Attorney Docket No.: 2000P07661US01

REMARKS

Upon entry of the instant amendment, claims 1, 3-6, 8-11, 13-16, and 18 are pending. Claims 2, 7, 12, and 17 have been canceled. Claims 1, 6, 11, and 16 have been amended to more particularly point out Applicants' invention. Claims 3, 8, and 13 have been amended to correct claim dependency. Claim 16 additionally has been amended to overcome the Section 112 rejection.

Claims 2, 12, and 17 were objected to under 37 CFR 1.75© as being of improper dependent form for failing to further limit the subject matter of a previous claim. Claims 2, 12, and 17 have been canceled. Claim 7 has similarly been canceled. As such, Applicants respectfully submit that the basis for the objection is obviated.

Claims 16-18 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. In particular, the term "said machine readable language" in claim 16 was indicated to lack antecedent basis. Claim 16 has been amended to recite "computer-readable program language"; thus, the examiner is respectfully requested to reconsider and withdraw the rejection.

Claims 1-2, 6-7, 11-12, and 16-17 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Chang, U.S. Patent No. 5,230,049 ("Chang") in view of Bapat, U.S. Patent No. 5,291,583 ("Bapat"). Applicants respectfully submit that the claimed invention is not taught, suggested, or implied by Chang or Bapat, either singly or in combination.

As discussed in response to previous Official Actions and the Specification, a computer system according to an implementation of the invention implements a translator and a compiler for compiling a machine readable language, such as ASN.1. When a source file is provided, the system performs a line-by-line compare to determine if the file contains extended grammar constructs of the language. If not, then the source file is compiled. If so, however, then the source file is input to the translator to translate the source file into basic grammar constructs. A basic grammar compiler then compiles the source file, such that the (translated) functions of

Serial No.: 09/586,410

Attorney Docket No.: 2000P07661US01

the extended grammar constructs can be executed as a compiled basic grammar construct compiled code. In certain embodiments, the translator may be implemented having multiple configurable levels of precompilation.

Thus, the claims have been amended to recite "wherein said compiler generates executable code implementing a function of the extended grammar constructs as compiled basic grammar constructs." In addition, claim 6 has been amended to recite "said translating including selecting from multiple configurable levels of precompilation;" and claims 1, 11, and 16 have been amended to recite "said translator [or code] configured to implement multiple configurable levels of precompilation."

In contrast, as described in the Summary of the Invention, an object of Chang is to provide a translator for computer source code which *simplifies the writing of pre-compilers*. It is a further object of Chang to allow pre-compilers to be written without requiring detailed knowledge of an underlying supplemental system."

To do so, Chang provides that

"a pre-compiler for host language programs which can contain embedded statements in a supplemental language is separated into two major portions. One portion is independent of the host language being processed; supplemental language statements are passed to it in a formal language independent format. This language independent format is responsible for parsing the language independent statements and generates a list of tasks which represent calls to a run time library.

"The other portion of the pre-compiler is dependent on the identity of the host language to be processed. It locates supplemental language statements in a host language program, transforms them into the language independent format, and communicates the transformed statements into the language independent portion. The language dependent portion receives the task list generated by the language independent portion and generates appropriate source code procedure calls to the run time library."

Chang thus provides for translating language specific program source code containing SQL database commands as supplemental language fragments into a language independent format. The language independent format is converted into a list of tasks and the list of tasks is then converted into source code statements in the

Serial No.: 09/586,410

Attorney Docket No.: 2000P07661US01

language specific format. This is indicated to simplify the task of devising pre-compilers.

The present invention, however, translates extended grammar constructs into basic grammar constructs, "wherein said compiler generates executable code implementing a function of the extended grammar constructs as compiled basic grammar constructs," i.e., without conversion into a separate language independent format. Furthermore, Chang nowhere provides for "multiple configurable levels of precompilation."

Bapat is relied on for allegedly teaching ASN.1 as "a machine readable language." Bapat, however, relates merely to "storing ASN.1 object instances in a relational database language such as SQL." Col. 1, lines 21-22. Like Chang, Bapat appears to have nothing to do with translating *extended* grammar constructs into *basic* grammar constructs, "multiple configurable levels of precompilation," or "wherein said compiler generates executable code implementing a function of the extended grammar constructs as compiled basic grammar constructs" as generally recited in the claims at issue. As such, the Examiner is respectfully requested to reconsider and withdraw the rejections.

Claims 3-5, 8-10, 13-15, and 18 were rejected under 35 U.S.C. §103 as being unpatentable over Chang in view of Bapat and further in view of "Applicant Admitted Prior Art (APAA)." Chang and Bapat have been discussed above. Applicant Admitted Prior Art is indicated to merely specify particular ASN.1 grammar extensions. Because, however, APAA falls to relate in any way to a translator as recited in the claims at issue (indeed, that is a very object of the present invention), its combination with Chang and Bapat likewise fails to teach, suggest or imply the present invention. As such, the Examiner is respectfully requested to reconsider and withdraw the rejections.

Serial No.: 09/586,410

Attorney Docket No.: 2000P07661US01

For all of the above reasons, Applicants respectfully submit that the application is in condition for allowance, which allowance is earnestly solicited.

Respectfully requested,

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